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**UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

No. 2:12-md-02323 (AB)

MDL No. 2323

**THIS DOCUMENT RELATES TO:**

Plaintiffs' Long-Form Complaint against  
Riddell Defendants and *Steven Bukich, et al.*, v.  
*Riddell, Inc., et al.*, California Central District  
Court Case No.: 8:17-cv-02119

**SHORT FORM COMPLAINT**

**IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION**

**JURY TRIAL DEMANDED**

**SHORT FORM COMPLAINT AGAINST RIDDELL DEFENDANTS**

1. Plaintiffs Steven Bukich, Mark Bukich, Andre Bukich and Alisa Stauter bring this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

2. Plaintiff(s) are filing this Short Form Complaint against Riddell Defendants as required by this Court's Case Management Order filed October 10, 2017.

3. Plaintiff continues to maintain claims against Riddell Defendants after a Class Action Settlement was entered into between the NFL Defendants and certain Plaintiffs.

4. Plaintiff incorporates by reference the allegations (as designated below) of Plaintiffs' Long-Form Complaint Against Riddell Defendants, as is fully set forth at length in this Short Form Complaint.

1           5. Plaintiff Steven Bukich is a resident and citizen of Laguna Niguel, California and  
2 claims damages as set forth below.

3           6. Plaintiff Mark Bukich is a resident and citizen of the state of Missouri and claims  
4 damages as set forth below.

5           7. Plaintiff Andre Bukich is a resident and citizen of San Diego, California and claims  
6 damages as set forth below.

7           8. Plaintiff Alisa Stauter is a resident and citizen of Boise, Idaho and claims damages as  
8 set forth below.

9           9. The Plaintiff sustained repetitive, traumatic sub-concussive and/or concussive  
10 head impacts during NFL games and/or practices. Upon information and belief, Plaintiff suffers  
11 from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or  
12 concussive head impacts the Plaintiff sustained during NFL games and/or practices. Upon  
13 information and belief, the Plaintiff's symptoms arise from injuries that are latent and have  
14 developed and continue to develop over time.

15           10. The original complaint by Plaintiffs in this matter was filed in the United States  
16 District Court for the Central District of California. If the case is remanded, it should be  
17 remanded to the Central District of California.

18           11. Plaintiffs claim damages as a result of [check all that apply]:

- 19           ☒ Injury to Herself/Himself  
20           ☐ Injury to the Person Represented  
21           ☒ Wrongful Death  
22           ☒ Economic Loss  
23           ☐ Loss of Services  
24           ☒ Loss of Consortium

25           12. [Check if applicable] ☒ Plaintiff reserves the right to object to federal  
26 jurisdiction.

27           13. Plaintiff bring this case against the following Defendants in this action [check all  
28 that apply]:

- 1                    ☒ Riddell, Inc.
- 2                    ☒ All American Sports Corp.
- 3                    ☒ Riddell Sports Group, Inc.
- 4                    ☒ BRG Sports, Inc.
- 5                    ☒ BRG Sports Holdings Corp.
- 6                    ☒ Easton-Bell Sports, LLC
- 7                    ☒ EB Sports Corp.
- 8                    ☒ BRG Sports, LLC

9                    14. [Check if applicable] ☒ The Plaintiff wore one or more helmets designed and/or  
 10 manufactured by the Riddell Defendants during one or more years Plaintiff played in the NFL  
 11 and/or AFL.

12                    15. Plaintiff played in [check if applicable] ☒ the National Football League  
 13 (“NFL”) and/or in [check if applicable] ☐ the American Football League (“AFL”) during the  
 14 following period of time 1953 to 1968 for the following teams: Los Angeles Ram; Washington  
 15 Redskins; Chicago Bears; and Pittsburgh Steelers.

16                    16. Plaintiff retired from playing professional football after the 1968 season.

17                    **CAUSES OF ACTION**

18                    17. Plaintiffs herein adopt by reference the following Counts of Plaintiffs’ Long-Form  
 19 Complaint, along with the factual allegations incorporated by reference in those Counts [check  
 20 all that apply]:

- 21                    ☒ Count I (Negligence)
- 22                    ☒ Count II (Strict Liability for Design Defect)
- 23                    ☒ Count III (Strict Liability for Manufacturing Defect)
- 24                    ☒ Count IV (Failure to Warn)

25                    18. Plaintiffs assert the following additional causes of action [write in or attach]:

26 \_\_\_\_\_  
 27 \_\_\_\_\_  
 28 \_\_\_\_\_

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

B. An award of economic damages in the form of medical expenses, out of pocket expenses, lost earnings and other economic damages in an amount to be determined at trial;

C. For punitive and exemplary damages as applicable;

D. For all applicable statutory damages of the state whose laws will govern this action;

E. For loss of consortium as applicable;

F. For declaratory relief as applicable;

G. For an award of attorneys' fees and costs;

H. An award of prejudgment interest and costs of suit; and

I. An award of such other and further relief as the Court deems just and proper.

**JURY DEMANDED**

Pursuant to Federal Rule of Civil Procedure 38, Plaintiffs hereby demand a trial by jury on all issues so triable.

Dated: May 15, 2014

**COLTON LAW GROUP**



ROLAND C. COLTON  
*Attorneys for Plaintiffs*